

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT
Alexandria Division**

UNITED STATES OF AMERICA,

v.

Criminal Case No. 1:18-cr-00457

BIJAN RAFIEKIAN, *et al.*,

Defendants.

**NON-PARTY MICHAEL T. FLYNN'S RESPONSE TO COURT ORDER
ADDRESSING DOCUMENT REDACTION ISSUES**

Pursuant to this Court's order granting non-party Michael T. Flynn leave to intervene and address issues of his privilege, undersigned counsel for Mr. Flynn and separate counsel for Flynn International Group ("FIG") have reviewed the three (3) documents specified in this Court's order Dkt. 237.

Without waiving any privilege of Mr. Flynn or FIG, or the work-product doctrine, with respect to any other documents or issues, Mr. Flynn and FIG have no objection to disclosing the passages specified in the Court's order Dkt. 237. Specifically this includes:

- Rafiekain_EDVA_00009799 – Page 1, bottom redaction
- Rafiekian_EDVA_00017651 – Page 5, bottom redaction
- Rafiekian_EDVA_00023166 – Page 2, all redactions

Since this response does not substantively discuss privileged communications, Mr. Flynn does not object to this document being publicly filed.

Dated: July 2, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2019, I filed the foregoing with CM/ECF, which will serve a copy on all counsel of record.

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